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January 3, 2022

**VIA ECF**

Hon. Sidney H. Stein  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

**Re: *United States v. Martin Ross*, S1 19 Cr. 913 (SHS)  
Second Request for Adjournment of Sentencing**

Dear Judge Stein:

We represent Mr. Martin Ross, in the above referenced matter. We write to request an adjournment of the sentencing hearing, now set for January 26, 2022. Counsel requires the additional time to adequately represent Mr. Ross in this matter, which in part includes reviewing our sentencing submission with him prior to its filing (which is currently scheduled to occur on January 5, 2022). With the MDC closed to legal visits since last week, this important part of our counseling is unavailable to us.

We have discussed this request with Assistant United States Attorney Jacob Fiddelman, and he has no objection. This is our second request for an adjournment of the sentencing. If the Court grants this request, counsel would propose the following schedule:

- Mr. Ross's sentencing submission would be due on February 7;
- The Government's sentencing submission would be due on February 14; and
- The sentencing would occur on February 28, 2022 before 3:30pm, on March 1, 2022 after 130pm, or at a time and date thereafter convenient to the Court.

Thank you for your attention to this matter.

Respectfully submitted,

/s/

Michael Martin  
Ian Weinstein

Lincoln Sq. Legal Services, Inc.  
Attorney for Mr. Martin Ross

cc: **Via ECF**  
Jacob R. Fiddelman  
Assistant United States Attorney  
Southern District of New York

The sentencing is adjourned to February 28, 2022, at 2:30 p.m.  
The defense submission is due by February 7, the government's  
submission is due by February 14, 2022. *No further adjournments.*

Dated: New York, New York  
January 3, 2022

SO ORDERED:

  
Sidney H. Stein, U.S.D.J.